

National Fire Protection Association (NFPA)  
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Suite 518  
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MSHA  
U.S. Dept of Labor

March 10, 2003

MSHA  
Office of Standards, Regulations and Variances  
1100 Wilson Blvd.  
Room 2313  
Arlington, VA 22209-3939

RE:  
**Federal Register**  
**68 FR 3939**  
**PROPOSED RULE**  
**Jan. 27, 2003**

To the Docket:

The National Fire Protection Association (NFPA) encourages the adoption of the latest edition of the National Fire Alarm Code, NFPA 72-2002. The current reference to the 1967 edition of NFPA 72A, Standard for the Installation, Maintenance and Use of Local Protective Signaling Systems for Guard's Tour, Fire Alarm and Supervisory Service, is inappropriate as this standard is obsolete. NFPA standards for protective signaling systems have evolved substantially since 1967. The requirements of NFPA 72A as well as other related standards have been updated many times and have been consolidated into a single National Fire Alarm Code since 1993. The 2002 edition of NFPA 72 includes changes that are reflective of the current state of the art, more so than the 1999 edition. These changes include those that relate to the sharing of circuits communicating between fire alarm signaling and non fire alarm signaling equipment. Note that the National Fire Alarm Code defines an alarm as one that indicates a "warning of fire." Other signals such as those for the detection of methane would not be considered a fire alarm signal.

The unique application of protective signaling systems in coalmines is not specifically addressed or contemplated in NFPA 72. However, many of the requirements found in NFPA 72 would or could apply. These include requirements fundamental to the performance of fire alarm systems and their components, administrative requirements, and requirements for maintenance and testing. Collectively these requirements are intended to assure the performance and reliability of the system. It must be noted that the application of protective signaling in a coalmine will require consideration of

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requirements beyond those presented in NFPA 72 to address the environmental conditions unique to a coalmine, and to address some of the unique needs of the AMS.

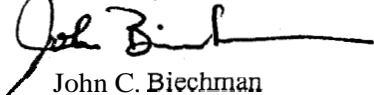
**Suggested language for the revision of 30 CFR 75.1103-2(b) follows:**

**30 CFR § 75.1103-2**

(b) Where applicable, and not inconsistent with these regulations, fire alarm systems including automatic fire sensors and other fire alarm system equipment shall be installed in accordance with the requirements set forth in the 2002 edition of the National Alarm Fire Code, **NFPA 72**. The National Fire Alarm Code, NFPA 72-2002 is hereby incorporated by reference and made a part hereof. The National Fire Alarm Code is available for examination at each Coal Mine Health and Safety District and Subdistrict Office of the Mine Safety and Health Administration, and may be obtained from the National Fire Protection Association, 1 Batterymarch Park, Quincy, MA 02269-9101 [[www.nfpa.org](http://www.nfpa.org)].

NFPA appreciates the opportunity to comment on the proposed rule. If you have questions or require clarification on any of NFPA's comments, please feel free to contact Lee Richardson or me.

—Sincerely,

A handwritten signature in black ink, appearing to read "John Biechman", with a long horizontal flourish extending to the right.

John C. Biechman  
Vice President  
Government Affairs  
NFPA